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5 Attorneys for Complainant

6
7 BEFORE THE FAIR POLITICAL PRACTICES COMMISSION
8 STATE OF CALIFORNIA
9

10 In the Matter of

11
12 HEATHER FARGO,

13
14 Respondent.
15

FPPC No.: 04/071

16
17 STIPULATION, DECISION, and
18 ORDER

19 Complainant Mark Krausse, Executive Director of the Fair Political Practices Commission, and
20 Respondent Heather Fargo agree that this stipulation will be submitted for consideration by the Fair
21 Political Practices Commission at its next regularly scheduled meeting.

22 The parties agree to enter into this stipulation to resolve all factual and legal issues raised in
23 this matter and to reach a final disposition without the necessity of holding an administrative hearing
24 to determine the liability of Respondent.

25 Respondent understands, and hereby knowingly and voluntarily waives, any and all procedural
26 rights set forth in sections 83115.5, 11503 and 11523 of the Government Code, and in section 18361.1
27 through 18361.9 of title 2 of the California Code of Regulations. This includes, but is not limited to, the
28 right to personally appear at any administrative hearing held in this matter, to be represented by an
attorney at Respondent's own expense, to confront and cross-examine all witnesses testifying at the
hearing, to subpoena witnesses to testify at the hearing, to have an impartial administrative law judge

1 preside over the hearing as a hearing officer, and to have the matter judicially reviewed.

2 It is further stipulated and agreed that Respondent Heather Fargo violated the Political
3 Reform Act by failing to timely report a source of income on her statement of economic interests, in
4 violation of Government Code section 87207, subdivision (a) (1 count), as described in Exhibit 1.
5 Exhibit 1 is attached hereto and incorporated by reference as though fully set forth herein. Exhibit 1
6 is a true and accurate summary of the facts in this matter.

7 Respondent agrees to the issuance of the decision and order, which is attached hereto.
8 Respondent also agrees to the Commission imposing upon her an administrative penalty in the amount
9 of Two Thousand Dollars (\$2,000). A cashier's check from Respondent in said amount, made payable
10 to the "General Fund of the State of California," is submitted with this stipulation as full payment of
11 the administrative penalty, to be held by the State of California until the Commission issues its
12 decision and order regarding this matter. The parties agree that in the event the Commission refuses to
13 accept this stipulation, it shall become null and void, and within fifteen (15) business days after the
14 Commission meeting at which the stipulation is rejected, all payments tendered by Respondent in
15 connection with this stipulation shall be reimbursed to Respondent. Respondent further stipulates and
16 agrees that in the event the Commission rejects the stipulation, and a full evidentiary hearing before
17 the Commission becomes necessary, neither any member of the Commission, nor the Executive
18 Director, shall be disqualified because of prior consideration of this stipulation.

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21 Dated: _____

Mark Krausse, Executive Director
Fair Political Practices Commission

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25 Dated: _____

Heather Fargo, Respondent

1 **DECISION AND ORDER**

2 The foregoing stipulation of the parties “In the Matter of Heather Fargo, FPPC No. 04/071,”
3 including all attached exhibits, is hereby accepted as the final decision and order of the Fair Political
4 Practices Commission, effective upon execution below by the Chairman.
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6 IT IS SO ORDERED.
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9 Dated: _____

10 Ross Johnson, Chairman
Fair Political Practices Commission
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